

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**(1) ANDRE TAYLOR, a/k/a “Dre”**  
**[DOB: 04/05/1966]**

**(2) HARLAN TAYLOR, a/k/a “Bub”**  
**[DOB: 08/29/1961]**

**(3) RAYMOND TAYLOR, a/k/a “Ray”**  
**[DOB: 12/31/1977]**

**(4) DARRYL TAYLOR, a/k/a ”**  
**“Cash Image” and “Cash”**  
**[DOB: 03/11/1978]**

**(5) CARL TAYLOR, a/k/a “Biggs”**  
**[DOB: 05/18/1979]**

**(6) ROBERT TAYLOR, a/k/a “R”**  
**[DOB: 08/16/1980]**

**(7) DANIEL HOWARD,**  
**[DOB: 08/02/1973]**

**(8) MARLON M. MINTON, a/k/a “M”**  
**[DOB: 11/07/1972]**

**(9) TYRONE ROCK,**  
**[DOB: 02/22/1972]**

**(10) ALLEN SANCHEZ a/k/a/ “Homey”**  
**[DOB: 02/26/1988]**

No. 12-00291-01/20-CR-W-GAF

**COUNT ONE: Defendants 1-14 and  
17-20 only**

***Conspiracy to distribute powder cocaine,  
marijuana***

21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 846  
NLT 10 Years, NMT Life Imprisonment  
NMT \$10,000,000 Fine  
NLT 5 Years Supervised Release  
Class A Felony

**COUNTS TWO, THREE, FOUR and  
SEVEN: D. Howard and Ray Taylor**

***Distribution of powder cocaine***

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)  
NMT 20 Years Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

**COUNTS FIVE and SIX: D. Howard, A.  
Taylor and Ray Taylor**

***Aiding and Abetting distribution of powder  
cocaine***

21 U.S.C. §§ 841(a)(1), (b)(1)(C)  
NMT 20 Years Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

**COUNT EIGHT: A. Taylor, K. Cooper  
and E. Union**

***Conspiracy to commit Murder for Hire***

18 U.S.C. § 1958  
NMT 10 Years Imprisonment  
NMT \$250,000 Fine  
NLT 3 Years Supervised Release  
Class C Felony

(11) RICK SCHOEN a/k/a “Steve” or  
“White Guy”  
[DOB: 02/07/1962]

(12) RUBEN MACHICHE  
[DOB: 04/12/1960]

(13) GREGORY JOHNSON a/k/a “G”  
[DOB: 08/02/1978]

(14) BRYANT WILLIS a/k/a “Spaghetti”  
[DOB: 10/27/1979]

(15) KENNETH VAUGHN COOPER  
[DOB: 10/31/1982]

(16) ERIC UNION a/k/a “E”  
[DOB: 09/13/1983]

(17) WILLIAM E. BROWN a/k/a “Billy”  
[DOB: 09/02/1971]

(18) RAHMON ALLEN a/k/a “Fat Boy”  
or “Rick Ross”  
[DOB: 09/25/1983]

(19) VICTOR VICKERS a/k/a “VV”  
[DOB: 04/15/1985]

(20) CHARLES E. WILLIAMS a/k/a  
“Charlie,” or “Mike,” or “Prick,” or  
“Guero,”  
[DOB: 12/11/1979]

**Defendants.**

**COUNT NINE: A. Taylor and K. Cooper**  
***Possessing machinegun in furtherance of***  
***a crime of violence***

18 U.S.C. §§ 924(c)(1)(B)(ii)

NLT 30 Years (consecutive)

NMT \$250,000.00 Fine

NMT 5 Years Supervised Release

Class C Felony

**COUNT TEN: K. Cooper**

18 U.S.C. § 922(g)(3) and 924(a)(2)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

**Allegation of Criminal Drug Forfeiture:**

**All defendants except Eric Union and**  
**Kenneth Vaughn Cooper.**

21 U.S.C. § 853

\$100 Special Assessment for Counts One  
through Ten

Defendant	Name	Counts
1	ANDRE TAYLOR	1, 5 and 6, 8, 9, Forfeiture
2	HARLAN TAYLOR	1 and Forfeiture

3	RAYMOND TAYLOR	1, 6 and 7 and Forfeiture
4	DARRYL TAYLOR	1 and Forfeiture
5	CARL TAYLOR	1 and Forfeiture
6	ROBERT TAYLOR	1 and Forfeiture
7	DANIEL HOWARD	1, 2, 3, 4, and 5 and Forfeiture
8	MARLON MINTON	1 and Forfeiture
9	TYRONE ROCK	1 and Forfeiture
10	ALLEN SANCHEZ	1 and Forfeiture
11	RICK SCHOEN	1 and Forfeiture
12	RUBEN MACHICHE	1 and Forfeiture
13	GREGORY JOHNSON	1 and Forfeiture
14	BRYANT WILLIS	1 and Forfeiture
15	KENNETH VAUGH COOPER	8, 9, and 10
16	ERIC UNION	8
17	WILLIAM E. BROWN	1 and Forfeiture
18	RAHMON D. ALLEN	1 and Forfeiture
19	VICTOR VICKERS	1 and Forfeiture
20	CHARLES E. WILLIAMS	1 and Forfeiture

## **SECOND SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES THAT:

### **COUNT ONE**

That between February 1, 2010, and the date of this Second Superseding Indictment, said dates being approximate, in the Western District of Missouri and elsewhere, **ANDRE TAYLOR**, a/k/a “Dre,” **HARLAN TAYLOR**, a/k/a “Bub,” **RAYMOND TAYLOR**, a/k/a “Ray,” **DARRYL TAYLOR** a/k/a “Cash Image” “Cash,” **CARL TAYLOR** a/k/a “Biggs,” **ROBERT TAYLOR**, a/k/a “R,” **DANIEL HOWARD**, **MARLON MINTON**, a/k/a “M,”

**TYRONE ROCK, ALLEN L. SANCHEZ** a/k/a “**Homey,**” **RICK SCHOEN** a/k/a “**Steve**” or “**White Guy,**” **RUBEN MACHICHE, GREGORY JOHNSON** a/k/a “**G,**” **BRYANT WILLIS** a/k/a “**Spaghetti,**” **WILLIAM E. BROWN** a/k/a “**Billy,**” **RAHMON D. ALLEN** a/k/a “**Fat Boy**” or “**Rick Ross,**” **VICTOR VICKERS** a/k/a “**VV,**” and **CHARLES E. WILLIAMS** a/k/a “**Charlie**” “**Mike,**” “**Prick,**” or “**Guero,**” defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to distribute: (1) a thousand (1,000) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance; and (2) cocaine, a Schedule II controlled substance, in an amount of five (5) kilograms or more, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846.

#### **COUNT TWO**

On or about July 21, 2011, within the Western District of Missouri, **DANIEL HOWARD**, a/k/a “**Saw,**” defendant herein, did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT THREE**

On or about November 9, 2011, within the Western District of Missouri, **DANIEL HOWARD**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT FOUR**

On or about December 22, 2011, within the Western District of Missouri, **DANIEL HOWARD**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT FIVE**

On or about January 5, 2012, within the Western District of Missouri, **ANDRE TAYLOR**, a/k/a “**Dre**,” and **DANIEL HOWARD**, defendants herein, aiding and abetting each other and others, did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

All in violation of Title 18, United States Code, Section 2.

#### **COUNT SIX**

On or about January 25, 2012, within the Western District of Missouri, **ANDRE TAYLOR**, a/k/a “**Dre**,” and **RAY TAYLOR**, defendants herein, aiding and abetting each other and others, did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

All in violation of Title 18, United States Code, Section 2.

#### **COUNT SEVEN**

On or about February 1, 2012, within the Western District of Missouri, **RAYMOND TAYLOR**, a/k/a “**Ray**,” defendant herein, others did knowingly and intentionally distribute a mixture or substance containing an amount of powder cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT EIGHT**

Between on or about August 14, 2012 and August 21, 2012, in the Western District of Missouri, and elsewhere, **ANDRE TAYLOR**, a/k/a “**Dre**,” **KENNETH VAUGHN COOPER**, and **ERIC UNION** a/k/a “**E**,” defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to travel in interstate commerce from Kansas City, Kansas, to Kansas City,

Missouri, with the intent that the murder of Billy Brown be committed, and did use a communication facility to discuss, plan, and arrange said murder, in violation of the laws of the state of Missouri, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, to wit: \$10,000 in United States currency, contrary to the provisions of Title 18, United States Code, Section 1958.

### **Overt Acts**

In furtherance of this conspiracy and to effect the objects of it, one or more of the conspirators committed, among others, the following overt acts:

1. On August 14, 2012, FBI agents intercepted a phone call (session #1374) between **Eric Union** and **Andre Taylor**. During this call Taylor mentions having seen “the dude” and wanting to get “dude in the morning shift.” **Union** replies that he’s (**Union**) is going to send him (**Cooper**) your direction.” **Taylor** responds, “I don’t give a fuck who it is if he [is] serious.” Later, agents intercepted a phone call (session #4487) between **Andre Taylor** and **Cooper**. They agree to meet. **Cooper** said, “show me how you wanna do it or let me know exactly how you want to do it.”
2. On August 16, 2012, FBI agents intercepted a call between **Cooper** and **Andre Taylor** arranging a meeting. Afterward, FBI surveillance units observed **Cooper** and **Taylor** meet and talk at 1617 North 9th Street, Kansas City, Kansas. On August 17, 2012, FBI agents intercept a phone call (session #4531) between **Andre Taylor** and unknown male. During the call, **Taylor** asks the unknown male if he knows “Billy Brown.” **Taylor** described Brown to the unknown male but the unknown male did not know him.
3. On August 18, 2012, FBI agents intercepted a call (session # 1970) between **Eric Union** and **Andre Taylor**. During this call, **Taylor** complains about not getting in touch with “dude” (**Cooper**) and says that he (**Taylor**) is about to do “something really silly.” **Union** tells **Taylor** not to do that and **Taylor** responds, “it’s necessary to kill him.”
4. On August 20, 2012, agents intercepted a call (session #4619) between **Andre Taylor** and **Kenneth Cooper**. **Taylor** and **Cooper** discuss the murder and various weapons that could be used. They discuss activity at the house of the intended victim. **Cooper** said he was “waiting” at the house from 10:30 to 2:20 a.m., on a recent evening. **Cooper** complained that there was too much activity at the house with people going in and out. **Cooper** also said he’s trying to get his other “hammer” to “lay on it how [he wants] to.” **Cooper** talked about having an AR-15 that fit inside a tennis racquet

bag. **Cooper** also said he “doesn’t plan on leaving any ballistics.” **Taylor** asked **Cooper** to meet him (**Taylor**) on the following day.

5. On August 21, 2012, agents intercepted a phone call (session # 4635) between **Cooper** and **Andre Taylor**. During the call **Taylor** told **Cooper** that he (**Taylor**) had [a] “hammer” at “23rd and Hardesty” and **Cooper** said he was going to come and get it. Later, during call (session # 4621) **Cooper** told **Andre Taylor** that **Cooper** was outside and **Taylor** told him to walk to the back.
6. On August 21, 2012, at approximately 9:15 p.m., FBI agents notified Jackson County Sheriff’s Deputies that **Kenneth Cooper** was riding inside as a the front seat passenger inside a red GMC Sierra bearing Kansas license plate “131 ELC.” FBI agents informed the deputies **Cooper** had several arrest warrants.
7. Thereafter, deputies activated their emergency lights and stopped the vehicle. As deputies made contact with the occupants of the vehicle they could smell the aroma of burnt marijuana coming from inside the vehicle. Furthermore, deputies noticed the driver, later identified as Kevin V. McBride, black male, who lives at 1617 North 9th Street, Kansas City, Kansas, appeared to be nervous and sweating profusely from his forehead. While this was occurring, another deputy contacted the front seat passenger who was later identified as **Kenneth Vaughn Cooper**. A computer check revealed **Cooper** had several active arrest warrants from Jackson County and Lee’s Summit, Missouri. Consequently, deputies arrested **Cooper** because of his warrants and deputies then performed a pat-down search of McBride and informed him his vehicle would be searched for contraband because of the marijuana odor.
8. During the ensuing search, deputies recovered a black “Kimber” (firearms manufacturer) case behind the driver’s seat. Deputies recovered a MAC-10 style homemade .45 caliber firearm inside the plastic case. Furthermore, deputies recovered one metal stick magazine stamped SPW GL C-153427 with eighteen (18) live rounds of .45 caliber ammunition found inside the case.
9. In addition, deputies recovered a Glock, Model 22, .40 caliber S&W semi-automatic handgun, serial number CRP008, from between the center console and the driver’s seat. The Glock was found with the slide locked back and no magazine inserted and no ammunition in the chamber. However, a Glock, .40 caliber S&W 15-round magazine containing thirteen (13) live rounds of ammunition was located within the center console area next to the firearm. An additional 10 live rounds of .40 caliber S&W ammunition was located inside the center console area.

### **COUNT NINE**

On or about August 21, 2012, in the Western District of Missouri, **ANDRE TAYLOR** a/k/a “Dre,” and **KENNETH VAUGHN COOPER**, defendants herein, in furtherance of a

crime of violence, to wit: Conspiracy to Commit Murder for Hire, as alleged in Count Eight, did knowingly and intentionally possess a firearm, to wit: a .45 ACP M10-type machinegun, as defined in Title 26 U.S.C. Section 5845(b) contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(B)(ii).

### **COUNT TEN**

On or about August 21, 2012, in the Western District of Missouri, **KENNETH VAUGHN COOPER**, defendant herein, being an unlawful user of, or addicted to a controlled substance, i.e. marijuana, as defined in Title 21, United States Code Section 802 did knowingly possess in and affecting commerce, ammunition, to wit: eight rounds of Federal, .45 caliber ammunition and 10 rounds of Winchester .45 caliber ammunition which had been transported in interstate commerce, contrary to the provision of Title 18, United States Code, Section 922(g)(3) and 924 (a)(2).

### **ALLEGATION OF FORFEITURE**

#### **ALLEGATION OF CRIMINAL DRUG FORFEITURE**

The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Each defendant named herein shall forfeit to the United States all property, real and personal, constituting and derived from any proceeds said defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this Allegation, including but not limited to the following:



1. **REAL PROPERTY**

All lots or parcels of land, together with their buildings, appurtenances, improvements, fixtures, attachments and easements, at the addresses listed and described as follows:

a. All of Lot 30 of Glen Oaks, a platted subdivision in Kansas City, Jackson County, Missouri. This tract of real property is commonly referred to as 13401 E. 54th Street, Kansas City, Missouri, 64133, and the owner of record is Shawnta Rushing.

2. **MISCELLANEOUS UNITED STATES CURRENCY**

a. The six thousand five hundred thirty-six (i.e. \$6,536.00) dollars cash seized from **Andre Taylor** during his arrest on September 27, 2012.

3. **PERSONAL PROPERTY**

a. A silver 2006 Ford F-350 truck with Colorado license plate number 746 XMM, with an attached 2012 Big Tex 120A trailer with Colorado license plate 732 XZY. The truck and the trailer license plates are registered to **Richard Schoen**, 640 S. Broadway, #145 Cortez, Colorado.

b. A black 2006 Chevrolet Impala with Missouri license plate FH9 F6C. The plate is registered to Birdella Taylor; however this vehicle was used by **Andre Taylor**.

c. A white 2004 BMW with Missouri license plate DD9 F2B. The license plate is registered to Tylisha Taylor, 1614 E. 19th Street, Kansas City, Missouri, however, this vehicle was used by **Andre Taylor**.

d. A grey 2004 Ford F-350 with Montana license plate 359532A with an attached 2010 Big Tex trailer with Montana license plate 330304A. The truck and the trailer plates are registered to **Ruben V. Machiche**, 706 N. 26th Street, Billings, Montana, 59101.

4. **MONEY JUDGMENT**

As to all designated defendants a money judgment in the amount not less than \$20,000,000.00 (20 million dollars), representing the total of all property, real and personal, constituting and derived from any proceeds obtained directly and indirectly as a result of the violation incorporated by reference in this allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this allegation.

It is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above-described forfeitable property, including, but not limited to the following:

- a. A silver 2006 Ford F-350 truck with Colorado license plate number 746 XMM, with an attached 2012 Big Tex 120A trailer with Colorado license plate 732 XZY. The truck and the trailer license plates are registered to **Richard Schoen**, 640 S. Broadway, #145 Cortez, Colorado.
- b. A black 2006 Chevrolet Impala with Missouri license plate FH9 F6C. The plate is registered to Birdella Taylor, however this vehicle was used by **Andre Taylor**.
- c. A white 2004 BMW with Missouri license plate DD9 F2B. The license plate is registered to Tylisha Taylor, 1614 E. 19th Street, Kansas City, Missouri, however, this vehicle was used by **Andre Taylor**.
- d. A grey 2004 Ford F-350 with Montana license plate 359532A with an attached 2010 Big Tex trailer with Montana license plate 330304A. The truck and the trailer plates are registered to **Ruben V. Machiche**, 706 N. 26th Street, Billings, Montana, 59101.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (1) Cannot be located upon the exercise of due diligence;
- (2) Has been transferred or sold to, or deposited with, a third person;
- (3) Has been placed beyond the jurisdiction of the Court;
- (4) Has been substantially diminished in value; or,
- (5) Has been commingled with other property which cannot be subdivided without difficulty;

All in violation of Title 21, United States Code, Section 853, and pursuant to Rule 32.2(a), Federal Rules of Criminal Procedure.

It is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above-described forfeitable property.

All in violation of Title 21, United States Code, Section 853, and pursuant to Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRU E BILL.

Dated: 2/25/14

/s/ Timothy L. Pierce  
FOREPERSON OF THE GRAND JURY

/s/ Stefan C. Hughes  
Stefan C. Hughes #40239  
Assistant United States Attorney